

# EXHIBIT 20.1

1 THE UNITED STATES SECURITIES AND EXCHANGE COMMISSION

2

3 In the Matter of: )

4 ) File No. HO-14036-A

5 DEEPROOT 575 FUND, LLC )

6

7 WITNESS: Robert Mueller

8 PAGES: 1 through 287

9 PLACE: Securities and Exchange Commission

10 100 F Street NE

11 Washington, D.C.

12 DATE: Wednesday, June 23, 2021

13

14 The above-entitled matter came on for hearing,

15 via WebEx, pursuant to notice, at 9:08 a.m.

16

17

18

19

20

21

22

23

24 Diversified Reporting Services, Inc.

25 (202) 467-9200

1 Q You've written and distributed private  
2 placement memoranda. Correct?

3 A We have distributed it to investors prior  
4 to subscription. Correct.

5 Q So when you distribute them you have some  
6 sort of mechanism for keeping control of who's gotten  
7 the PPM. Correct?

8 A That answer is quite complicated but there  
9 was a time where we put an identifier on there that  
10 would match a PPM with an application and subscription  
11 agreement.

12 Q That's exactly the question I was asking a  
13 few minutes ago. Now, where do you keep a log of the  
14 numbers you put on PPMs when you sent them out?

15 MR. PRITIKIN: Objection. That's assuming  
16 there is a log but go ahead.

17 A There -- there are some pages that Becca,  
18 who is the clerk that takes care of that. I do not know  
19 if she keeps those logs. I haven't seen those logs  
20 since we stopped taking them. So I'm not aware that  
21 those logs even exist.

22 Q But you haven't produced any old logs from  
23 when you used this system. Correct?

24 A My struggle with answering this is my  
25 understanding of the subpoenas that were originally done

1 would have been organized. And some of them were  
2 delisted or dormant for a while. Some were not. Some  
3 are dormant now whereas they were not before.

4 Q You've alluded to this. But you've  
5 formerly run some other investment funds. Correct?

6 A It's a very broad question. I cannot  
7 answer it.

8 Q I'm happy to specify. You mentioned the  
9 Deeproot Short-Term Fixed Rate Debenture Fund LLC.  
10 Correct?

11 A Correct.

12 Q There was also the Deeproot 3-Year Bonus  
13 Income Debenture Fund LLC.

14 A Yes.

15 Q And there was the Deeproot 3-Year Bonus  
16 Reset Debentures Fund LLC.

17 A Yes.

18 Q And the Deeproot Bonus Growth 5-Year  
19 Debenture Fund LLC.

20 A Yes.

21 Q Are there any other investment funds that  
22 you've run besides those and the current funds?

23 A There -- I mean, I'm going to refer back to  
24 the corporate org charts that I provided for relevant  
25 lists in those time periods.

1 Q What I'm asking, so the org chart that was  
2 Exhibit 5 began at 2016. And what I'm getting at is  
3 that I believe these four funds I've named pre-dated --  
4 largely pre-dated 2016. Is that correct?

5 A I do not remember. They were organized  
6 before then, but I don't remember exactly when a lot of  
7 those placements happened and whether they happened  
8 prior to 2016.

9 Q These four funds, STFR, Short-Term Fixed  
10 Rate Debenture Fund, 3-Year Bonus, 3-Year Bonus Reset  
11 and the Bonus Growth 5-Year. These four funds, are they  
12 still active?

13 A No. None of them are taking new  
14 subscriptions.

15 Q Are they all wound up?

16 A I don't know what wound up means.

17 Q Well, have all the funds' investors been  
18 paid back and the funds are now closed?

19 A On some, but not others.

20 Q Which ones are still open?

21 A The Bonus Growth -- 5-Year Bonus Growth and  
22 the 3-Year Bonus Reset. I'm not sure on the Bonus  
23 Reset. And I know there was maybe one or two investors  
24 left. I don't know if those are in some -- have matured  
25 or not. But I know specifically that the 5-Year Bonus

1 Growth does have existing investors still.

2 Q And so when you say existing investors,  
3 these are investors who are still waiting for repayment  
4 of their principal?

5 A Correct.

6 Q Are they still receiving some sort of  
7 investment return?

8 A For both of them, it's a deferred return at  
9 maturity. So there are no periodic payments.

10 Q Currently, you have the 575 Fund LLC and  
11 the Deeproot Growth Runs Deep Fund LLC. Correct?

12 A Correct.

13 Q Are those the only two funds that you're  
14 currently operating?

15 A That we are taking subscriptions for. That  
16 is correct.

17 Q And in terms of funds that have any  
18 activity or any return of principal pending, it's just  
19 the 575, the DGRD, and the one or two other funds we  
20 just discussed -- older funds we just discussed.

21 Correct?

22 A To the best of my recollection. Yes.

23 Q Can we agree to call the Deeproot Growth  
24 Runs Deep Fund the DGRD Fund?

25 A Yes. That's how we normally abbreviate it.

1 reports. I'd have to look at -- from those reports, to  
2 determine where we were with at least the policy. A  
3 portion of the 575. I'd have to sort of guesstimate  
4 where expenses are currently and where they would go,  
5 which would take some time and a lot of pulling together  
6 with the assets of the 575. And then I would try to  
7 determine both percentages are against each other and  
8 determine if we were still above 50 percent, close to  
9 it, what we needed to do with that.

10 Q How often, each year, do you engage in that  
11 exercise?

12 A Usually one to two times. In past years  
13 it's been more. When we had a lot more investment in  
14 the DGRD versus the 575. Because we wanted to space  
15 those, to not prejudice investors in the DGRD. But since  
16 -- especially with COVID and the impact it had on our  
17 business, and everyone's business last year, to the  
18 present, in the last year, year and a half, it has not  
19 happened more than about once or twice.

20 Q Do you -- when you undertake this analysis,  
21 do you document it?

22 A No. The documentation essentially for me  
23 is just to do the transaction to do the purchase,  
24 knowing when it would happen.

25 Q Do you personally undertake that evaluation

150

1 the 575 Fund? And the DGRD Fund?

2 A Yes.

3 Q Who determines the investment strategy of  
4 the 575 Fund?

5 A I do.

6 Q Anyone else?

7 A The design strategy would only be me.

8 Q Who chooses the asset classes and the  
9 actual assets in which the 575 Fund invests?

10 A I make the final decision.

11 Q You have the ultimate authority over these  
12 investment decisions?

13 A That is correct.

14 Q Who purchases the actual assets in which  
15 the 575 Fund invests?

16 A I do as officer of the respective company.

17 Q Other than attorneys, who has drafted the  
18 language used in the 575 Fund PPM?

19 A Myself.

20 Q Only you?

21 A No. That actually brings me back to --  
22 that's why I was looking at the different exhibits you  
23 were handing in the dates. Anything after the S-1 had  
24 -- S-1 incorporating language, which would have been a  
25 combination of attorneys, Centri Business Consulting,

1 Q It was your choice to incorporate any  
2 language that any of these other people may have  
3 suggested. Correct?

4 A I think it was a very proper choice, in my  
5 view, after the amount of time and effort and money that  
6 was spent to properly vet some of these provisions. I  
7 think it was money well spent to use provisions that  
8 have been vetted that well.

9 Q But it was your choice as to what language  
10 went into the PPM for the 575 Fund. Correct?

11 A Ultimately, yes. The choice was mine.

12 Q And that was true as to all versions of the  
13 575 Fund PPM. Correct?

14 A I would not say that that's -- it was  
15 between me and counsel.

16 Q And with respect to -- but other than  
17 counsel, you had the final choice as to the language in  
18 all versions of the 575 Fund PPM. Correct?

19 A Correct.

20 Q And counsel works for you. Right?

21 A I think that draws a legal conclusion.

22 Q You're the one with the final authority  
23 over the content of the 575 Fund PPM. Correct?

24 A Sometimes. Yes.

25 Q On what occasions would you not be the one

1 (SEC Exhibit No. 39 was marked for  
2 identification.)

3 A Yes.

4 Q Do you recognize Exhibit 39?

5 A I do.

Q And what is Exhibit 39.

A It looks like the September 16, 2019 PPM  
for the Deeproot Growth Runs Deep Fund, or the DGRD.

9 Q And you were the person with ultimate  
10 authority over the language that went into the PPM in  
11 Exhibit 39. Correct?

12 A Yes.

13 Q And you were the person with ultimate  
14 authority over the language in all other DGRD Fund PPMs.  
15 Correct?

16 A Yes.

17 Q Who has and exercises the authority to sell  
18 an asset of the 575 Fund?

19 A What do you mean by sale?

20 Q Well, if you were to make decisions to  
21 dispose of an asset of deeproot Tech or Pinball, if you  
22 were to make a decision to sell a policy rather than to  
23 hold it, a life insurance policy. Who would be the  
24 person with ultimate authority to make those decisions?

25 A With counsel from numerous -- not just

1 Q Well, how is the capital acquisition  
2 documented or memorialized?

3 A From which perspective?

4 Q From the perspective of the 575 Fund or the  
5 DGRD Fund having its investors' money go to a Deeproot  
6 affiliate.

7 A Correct. But if you could help me, is it  
8 from an accounting perspective or a legal perspective.

9 Q From the perspective --

10 A Because things are either one of those.

11 Q From the perspective of documenting, what  
12 interest, the 575 Fund, the DGRD Fund, gets in return  
13 for the money.

14 A So, from a documentation standpoint, the  
15 way that I understand the accountants document that, is  
16 through the bay [sic] transactions. Up until COVID hit,  
17 my understanding was that the intercompany tracked  
18 transactions as they came into Deeproot Funds, to the  
19 account, then to the Fund, and then to be placed. And  
20 since COVID, because it's been so complicated to  
21 continue that, is that we've gone to more of a direct  
22 route.

23 Q Other than bank records, how is the  
24 interest acquired by the 575 Fund or the DGRD Fund  
25 memorialized or documented?

1           A     I mean, it's financial. I mean, it's going  
2 to be in the transactions.

3                   BY MR. BAGNALL:

4           Q     So, Mr. Mueller, this is George Bagnall  
5 again. Can you hear me, sir?

6           A     Yes.

7           Q     Maybe it would help if we took a step back  
8 and you could tell us more about how you operate your  
9 businesses in this way. So, after investor money comes  
10 into the fund, either the 575 Fund or the DGRD Fund, who  
11 makes the decision whether or not to invest some of that  
12 money in any of the Deeproot affiliated businesses?

13          A     Ultimately, that decision is my decision.  
14 And as I've said before, a few moments ago, the way that  
15 operated -- we operated for the most part, I don't know  
16 when we started that process, but I know that the  
17 process was there for a long period of time and it  
18 created all kinds of accounting nightmares, trying to  
19 trace the intercompanies' transfers. But that money  
20 would come directly into the Deeproot Funds, sweep  
21 account, bank account. It would then be transferred  
22 less the finder fee or advisory fee or commission to the  
23 actual fund bank account. And then from the fund bank  
24 account, it would be transferred and placed directly  
25 with Policy Services or with deeproot Tech, Deeproot

1 another purpose, and I just can't recall.

2 Q Do you have any other recollection of what  
3 the purpose of this agreement at Exhibit 66 would've  
4 been?

5 A No. Unless you'd like to enlighten me on  
6 where you received it. That would very much help  
7 without me having to go back and try to look back  
8 through the documents and records and notes.

9 Q You mentioned before the break that there  
10 was an agreement between the funds and the  
11 Deeproot-related entities. We discussed that before the  
12 break. Is Exhibit 66 that agreement?

13 A No, it is not.

14 Q It's not? Okay. I think we'll move on.

15 BY MR. BAGNALL:

16 Q So, Mr. Mueller, do you see there at the  
17 first page of -- sorry. This is George Bagnall. Do you  
18 see at the top of Exhibit 66 in the opening paragraph,  
19 it references in the second to last line both the 575  
20 Fund and the DGRD Fund? Do you see that?

21 A Yes. That's what I mentioned before. I  
22 saw that immediately.

23 Q And so this agreement that -- I'm sorry if  
24 I'm making you repeat yourself. I was just a little  
25 confused maybe by the answer. So this doesn't govern

1 any of the relationship, the financial relationship  
2 between the funds the related businesses?

3 A I do not know why this was created. I  
4 would have to review it and go back for notes and try to  
5 figure out. I don't know if it was trying to close a  
6 hole in something else or if it was presented to an  
7 investor or a financial advisor for another purpose. I  
8 just can't remember.

9 Q So the agreement that we were talking about  
10 before the break, was it created before or after the  
11 date, November 20, 2020?

12 A Could you give me a second, sir? I'm  
13 flipping through this --

14 Q Sure.

15 A -- here.

16 Q Yeah. And just as you're flipping through,  
17 you'll notice in the bottom right-hand corner, there's  
18 some Bates stamps there. Maybe there's not. I thought  
19 there were.

20 A I'm not -- I just want to make sure as I'm  
21 flipping through here. I'm not contesting the  
22 legitimacy of the document. I just -- believe me. As  
23 you all said, there are a lot of documents. Maybe not  
24 as many as you wanted and maybe not as soon as you  
25 wanted, but there are a lot of documents that I had to

1 you want and then I'll read that section then. I think  
2 that would be easier in this case since like --

3 Q Okay. Do you recognize Exhibit 73?

4 A Must have been an e-mail that we must have  
5 received. I don't remember the e-mail in question.

6 Q Do you recognize the letter that's attached  
7 to it?

8 A Letter, I believe was the letter we sent  
9 out to all 575 P investors. This is the letter I  
10 referred to before, so. Oh wait. Let me read this. I  
11 apologize, 'cause there was an August letter that we  
12 sent out.

13 Yea, I'm sorry. This is not that letter.  
14 This was the letter we sent out in August -- the time  
15 that 575 P would be paid because it was getting out of  
16 control.

17 Q Okay. You drafted this letter. Correct?

18 A Yes.

19 Q And this letter was transmitted to 575 Fund  
20 investors. Right?

21 A Correct.

22 Q How was it transmitted to those investors?

23 A We sent the letter through a third party  
24 mailing service that mailed hard copies to all  
25 investors.

288

1 THE UNITED STATES SECURITIES AND EXCHANGE COMMISSION

2

3 In the Matter of: )

4 ) File No. HO-14036-A

5 DEEPROOT 575 FUND, LLC )

6

7 WITNESS: Robert Mueller

8 PAGES: 288 through 387

9 PLACE: Securities and Exchange Commission

10 100 F Street NE

11 Washington, D.C.

12 DATE: Thursday, June 24, 2021

13

14 The above-entitled matter came on for hearing,

15 via WebEx, pursuant to notice, at 9:03 a.m.

16

17

18

19

20

21

22

23

24 Diversified Reporting Services, Inc.

25 (202)467-9200

1 wait until the end as well.

2 MR. PRITIKIN: Nothing at this point.

3 Q Okay. Thank you. I have a few clean-up  
4 questions, Mr. Mueller. Have you ever tried to become  
5 an associated person of a broker dealer?

6 A Depends what you mean by try. I took some  
7 -- as I disclosed, I took some education to sit for  
8 Series 7 but it never went any further than that.

9 Q Did you take any other steps relating to  
10 trying to become an associated person of a broker  
11 dealer?

12 A Not that I recall.

13 Q And when was that that you did the training  
14 for the Series 7?

15 MR. PRITIKIN: Objection. That  
16 mischaracterizes his testimony.

17 Q Correct me if I'm wrong, Mr. Mueller, but I  
18 believe you did some education, some Series 7 prep and  
19 when did you do that?

20 A I don't recall. It was -- if I had to  
21 narrow it down to a timeline it was before the 575 and  
22 the DGRD were put into place.

23 Q What is the Food Development Corporation of  
24 Texas?

25 A FDC, as I call it. It is a company that

1 works with either NGOs, governments, or other  
2 corporations typically in North Africa and we invested  
3 equity prior to Deeproot. I invested my own equity and  
4 then through Policy Service in the early days before  
5 Deeproot really got going, we added some additional  
6 money and then we purchased some additional equity  
7 shares. I believe probably about two years ago.

8 Q What have you received from that  
9 investment? What has the Deeproot family of companies  
10 received from that investment in Food Development  
11 Corporation of Texas?

12 A So we have not received any distributions.  
13 We have not received any dividends from that, from that  
14 equity.

15 Q Now, you mentioned -- I think you mentioned  
16 that the investment happened before Deeproot got going  
17 and then in recent years, for the sake brevity, Policy  
18 Services Inc. has sent \$385,000 between July 2016 and  
19 April 2020 to FDC of Texas. I'm wondering have you  
20 received any sort of stock certificates or other  
21 certificated investments in FDC?

22 A There are other share certificates. There  
23 were agreements which confirmed those shares.

24 Q What percentage of FDC does the Deeproot  
25 family of companies own?

1           A     I don't recall the specific number but it  
2 is just less than 50 percent from my best recollection.

3           Q     Have you ever provided any legal advice to  
4 FDC?

5           A     I don't know if I've provided legal advice  
6 to FDC as most of their dealings are with international  
7 law which I'm not versed in. I can't recall though. It  
8 might have happened that a question was asked or I was  
9 asked to look over a document or something but I can't  
10 recall specifics.

11          Q     Who owns the other 49 or 50 or 51 percent,  
12 the remainder of the equity of FDC?

13          A     A gentleman named Frank Kartchner as far I  
14 know.

15          Q     Thank you. In addition to the loan we  
16 discussed yesterday you've obtained other loans for the  
17 Deeproot family of companies. Correct?

18          A     Yes. I did notice after in clarifying  
19 yesterday's questions about that, I did recall after  
20 getting back to my hotel room and doing some work that  
21 there is a line of credit through Wells Fargo for Policy  
22 Services.

23          Q     How much is that line of credit?

24          A     It's in the 30 -- \$30,000 range. I don't  
25 remember the exact amount.

1 A I do.

2 Q What is Exhibit 85?

3 A It was a distribution for the purchase of a  
4 condo in Kauai.

5 Q Can you spell Kauai for the record?

6 A K-A-U-A-I.

7 Q And that's in Hawaii, obviously. Right?

8 A It's a county in Hawaii that I'm aware of.

9 Yes.

10 Q On or about November 15, 2016 you wired  
11 \$135,000 from the bank account of Policy Services, Inc.  
12 to Old Republic Title and Escrow in Hawaii. Correct?

13 A That is correct.

14 Q What was the purpose -- you described this  
15 a little bit. But can you tell us what the purpose of  
16 this expenditure was, more fully?

17 A The purpose was to go toward the purchase  
18 price of a condo in Kauai.

19 Q This was approximately half of the purchase  
20 price and closing costs for that condo. Correct?

21 A I don't recall.

22 Q That condominium was titled in the name the  
23 MB, as in Mike Bravo, the MB Hale Ohana Trust. Correct?

24 A That sounds correct. Yes.

25 Q And for the record, Poly Ohana is two

1 words, H-A-L-E O-H-A-N-A. Mr. Mueller, you, your father,  
2 and your stepmother have been the three trustees of the  
3 MB Hale Ohana Trust. Correct?

4 A I don't remember exactly who the trustees  
5 are. We're all grantors of the trust.

6 Q And you're a beneficiary of this trust.  
7 Correct?

8 A We would all be as grantors. Yes.

9 Q You used \$135,000 of investor funds towards  
10 the purchase of a condominium in Hawaii. Correct?

11 A I would not characterize it like that. I  
12 do not believe that's a correct statement.

13 Q This was a personal expense. Correct?

14 A I would not consider it a personal or a  
15 business expense.

16 Q If it's not a personal or a business  
17 expense, then what is it?

18 A It's a distribution.

19 Q What documentation exists for this  
20 distribution? Other than payment records. Other than  
21 bank records or QuickBooks records and the like.

22 A So, it was accounted for that year by  
23 Charlotte, Ms. Acker as a distribution. And it was  
24 discussed with the accountants. As I recall, anything  
25 else beyond that, I do not recall.

1 Q And Mr. Van Winkle, an officer of Americus  
2 Diamond, and the reason why I mention his name is  
3 because the charge has variously shown as being to him  
4 or to Americus Diamond. So let me ask a fresh question.  
5 On or about December 15th, 2018 you paid Americus  
6 Diamond \$6,247.11 for jewellery. Correct?

7 MR. PRITIKIN: Objection.

8 A I appears so, yes.

9 Q And again, you used the American Express  
10 card of National Wealth Solutions.

11 A I don't recall on that. It says American  
12 Express.

13 Q Who was the jewellery for?

14 A The best I can remember, around that time  
15 period it was for my current wife, Kristi.

16 Q And you married her approximately two  
17 months after this purchase. Correct?

18 A I believe it was more than that, but it was  
19 in early 2019 that we got married as talked about on the  
20 record.

21 Q And can you scroll to the description of  
22 the jewellery you purchased?

23 A Okay.

24 Q And the description says it's a lady's  
25 engagement ring. Correct?

1           A     Yes. That is in the description. Lady's  
2 engagement ring.

3           Q     In fact, on January 12th, on or about  
4 January 12th of 2019 you charged another \$2,802.59 to  
5 Americus Diamond. Correct?

6           A     I do not verify -- I'm sorry. Do not  
7 remember that.

8           Q     This over \$9,000 in jewellery reflects  
9 personal expenses. Correct?

10          A     I don't know.

11          Q     These expenses were paid using Deeproot  
12 company money. Correct?

13          A     I refuse to answer. I invoke my right to  
14 protection under -- against self-incrimination under  
15 the Fifth Amendment.

16          Q     Sir, we are not authorized to compel you to  
17 give evidence or testimony as to which you assert your  
18 privilege against self-incrimination pursuant to the  
19 Fifth Amendment of the United States -- to the United  
20 States Constitution and we have no intention of doing  
21 so. We also do not have the authority to compel your  
22 testimony by granting you immunity from prosecution.  
23 Any question that we ask hereafter will be with the  
24 understanding that if you wish to assert your privilege  
25 against self-incrimination you need merely state that

1 for your second wife. Leah. Correct?

2 A I don't remember.

3 Q Sir, I am now showing what has been marked  
4 as Exhibit 92. And Exhibit 92 bears the Bates number  
5 SEC-Americus-E0000005 through 8. America -- Exhibit 92  
6 is another four page document. It also says Americus  
7 Diamond on the top center of the front page. It also  
8 has the address 12362 IH 10 West in San Antonio, Texas.

9 (Mueller Exhibit 92 was marked for  
10 identification.)

11 Q Sir, do you recognize Exhibit 92?

12 A I'm looking through it.

13 Q Please take your time.

14 A It appears to be again a purchase for  
15 jewellery, Americus Diamond, around the time that --  
16 that I was engaged to Leah as you mentioned.

17 Q And at the bottom of page 2, it  
18 specifically gives the name of Ms. Leah Nelson.  
19 Correct? Near the description of the jewellery. I'm  
20 sorry. I spoke over you. I apologize.

21 A I do see that.

22 Q You do see where it says Leah Nelson in  
23 Exhibit 92?

24 A Yes.

25 Q And on or about the next day, December

1       15th, you charged another \$2,976.88 on the National  
2       Wealth Solutions card at Americus Diamond. Correct?

3                   MR. PRITIKIN: Objection.

4       A     I don't know. That's not shown on this  
5       exhibit.

6       Q     This exhibit shows that on December 14th,  
7       2015, you charged \$5,351.88 using the American Express  
8       card of NWS at Americus Diamond. Correct?

9                   MR. PRITIKIN: Objection.

10      A     It appears to be that amount and it says  
11       American Express on it.

12      Q     This jewellery was purchased using Deeproot  
13       company money. Correct?

14      A     I refuse to answer. I invoke the right  
15       against self-incrimination under the Fifth Amendment.

16      Q     Sir, I'm now showing you what's been marked  
17       as Exhibit 93.

18                   (Mueller Exhibit 93 was marked for  
19       identification.)

20      Q     And sir, Exhibit 93 bears the Bates range  
21       SEC-RFPA-AMEX-E-0002809 through 29 and it is another  
22       American Express duplicate copy account statement of the  
23       credit card of National Wealth Solutions ending in  
24       4251001. Sir, do you recognize Exhibit 93?

25      A     Appears to be a duplicate copy of an Amex

1 A Are you asking me to looking or are you  
2 just asking me the question?

3 Q I'm just asking you the question, sir.

4 A I don't know.

5 Q All in all, you spent -- you charged  
6 \$7,795.37 in expenses at Wolf Weddings & Events.

7 Correct?

8 MR. PRITIKIN: Objection.

9 A I don't know.

10 Q These expenses were for your wedding to  
11 your second wife Leah in -- these expenses were for your  
12 wedding to your second wife Leah. Correct?

13 MR. PRITIKIN: Objection.

14 A Would appear to be around that time.

15 Q And you married Ms. Leah Nelson in February  
16 of 2016. Correct?

17 A To the best of my memory, yes.

18 Q You paid these expenses for Wolf Weddings &  
19 Events with Deeproot company money. Correct?

20 MR. PRITIKIN: Objection.

21 A I refuse to answer. I invoke my right to  
22 -- against self-incrimination within the Fifth  
23 Amendment.

24 Q Sir, I'm now going to display what has been  
25 marked as Exhibit 94. Exhibit 94 bears the Bates range

1 2017 you also charged \$2,507.33 to British Airways.

2 Correct?

3 MR. PRITIKIN: Objection.

4 A I do see that amount listed.

5 Q And this American Express card statement  
6 shows that you purchased airline flights to London in  
7 the name of you and your child. Correct?

8 MR. PRITIKIN: Objection.

9 A I don't know.

10 Q Sir, did you travel to London on British  
11 Airways or a British Airways affiliated carrier with  
12 your daughter?

13 A And I've travelled before with my daughter  
14 on British Airways. I don't recall this specific trip.

15 Q Sir, between September 2016 and March of  
16 2017, in fact, you used the American Express card in the  
17 name of National Wealth Solutions to pay over \$13,000 to  
18 British Airways. Correct?

19 MR. PRITIKIN: Objection.

20 A I don't know.

21 Q But these were personal travel expenses  
22 which were paid for using Deeproot company money.  
23 Correct?

24 A I refuse to answer. I invoke my right  
25 against self-incrimination under the Fifth Amendment.

1 A I don't know.

2 Q These expenditures to Disney Cruise Lines  
3 were personal travel for you and your family. Correct?

4 A I don't know.

5 Q This personal travel was paid for with  
6 Deeproot company money. Correct?

7 MR. PRITIKIN: Objection.

8 A I refuse to answer. I invoke my right  
9 against self-incrimination under the Fifth Amendment.

10 Q Sir, between March of 2016 and March of  
11 2019 you also used the Amex card of National Wealth  
12 Solutions to pay over \$15,000 to Princess Cruise Lines.  
13 Correct?

14 MR. PRITIKIN: Objection.

15 A I don't know.

16 Q This was personal travel. Correct?

17 A I don't know.

18 Q These charges to Princess Cruise Lines were  
19 paid for with Deeproot company money. Correct?

20 MR. PRITIKIN: Objection.

21 A I refuse to answer. I invoke the right --  
22 sorry. I invoke my right against self-incrimination  
23 under the Fifth Amendment.

24 Q Sir, on or about February 5th, 2018, you  
25 charged 7,000 -- over \$7,500 to cruises and more using

1 Q Sir, you used Deeproot company money to pay  
2 for your daughter's educational expenses. Correct?

3 MR. PRITIKIN: Objection.

4 A Refuse to answer. I invoke my right  
5 against self-incrimination under the Fifth Amendment.

6 Q Sir, you used Deeproot company money to pay  
7 for medical expenses. Correct?

8 MR. PRITIKIN: Objection.

9 A I refuse to answer. I invoke my right  
10 against self-incrimination under the Fifth Amendment.

11 Q Sir, you used Deeproot company money to pay  
12 personal income tax bills. Correct?

13 MR. PRITIKIN: Objection.

14 A I refuse to answer. I invoke my right  
15 against self-incrimination under the Fifth Amendment.

16 Q Sir, you used Deeproot company money to pay  
17 for the condominium in Hawaii. Correct?

18 MR. PRITIKIN: Objection.

19 A I refuse to answer. I invoke my right  
20 against self-incrimination under the Fifth Amendment.

21 Q Sir, you used Deeproot company money to pay  
22 for the catering, photography, and wedding planning  
23 expenses for your 2019 wedding. Correct?

24 MR. PRITIKIN: Objection.

25 A I refuse to answer. I invoke my right

1 against self-incrimination under the Fifth Amendment.

2 Q Mr. Mueller, before we conclude your  
3 testimony do you wish to clarify anything or add  
4 anything to the statements you have made over the course  
5 of your testimony whether yesterday or today?

6 A Like for a chance to speak with my  
7 attorneys before I answer that question.

8 Q Sure. We can go off the record. How long  
9 do you need?

10 A A few minutes. Five minutes.

11 MR. BOHR: Five minutes. Okay. Let's go  
12 off the record at 12:25.

13 (Whereupon a discussion was held off the  
14 record.)

15 MR. BOHR: We're back on the record at  
16 12:30.

17 BY MR. BOHR:

18 Q Mr. Mueller, do you understand you're still  
19 under oath?

20 A I do.

21 Q And can you confirm that the SEC and you  
22 had no substantive discussions while we were off the  
23 record?

24 A Yes.

25 Q Thank you, sir. Mr. Mueller, when we went